

10876

**GARDNER, CARTON & DOUGLAS**

SUITE 3400-QUAKER TOWER

321 NORTH CLARK STREET

WRITER'S DIRECT DIAL NUMBER

CHICAGO, ILLINOIS 60610-4795

WASHINGTON, D.C.

MARK LATHAM  
(312) 245-8788

(312) 644-3000

TELEX: 25-3628

TELECOPIER: (312) 644-3381

July 8, 1994

**VIA MESSENGER**

Mr. Carlton D. Cuffman  
Superfund Program Management  
Branch (HSMP-5J)  
United States Environmental  
Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**RECEIVED**  
JUL 8 1994

**SUPERFUND PROGRAM  
MANAGEMENT BRANCH**

**Re: Tri-County/Elgin Landfill Superfund Site**

Dear Mr. Cuffman:

This response and enclosed documents are being submitted to you on behalf of the Northern Illinois Gas Company ("Northern Illinois Gas") pursuant to the §104(e) Information Request dated May 3, 1994. In that §104(e) Information Request certain information was requested with respect to the above-referenced site ("Site"). As we agreed, the response of Northern Illinois Gas is due on or before July 8, 1994.

By submitting this response, Northern Illinois Gas does not admit any liability or responsibility for the costs incurred or to be incurred at the Site. Furthermore, Northern Illinois Gas objects to the scope of the §104(e) Information Request to the extent that it is overly broad. For example, it seeks information dating back from 1950 when Attachment A to the §104(e) Information Request specifically identifies 1961 as the first year of disposal activity at the Site. Notwithstanding this objection, however, Northern Illinois Gas has conducted a thorough investigation to determine what, if any, information it has with respect to the Site.

As part of that investigation Northern Illinois Gas submitted a Freedom of Information Act ("FOIA") request dated May 19, 1994, requesting all documents that purport to link Northern Illinois Gas to the Site. As of the date of this response, we have not been provided with copies of, or access to, such documents. Northern Illinois Gas reserves the right to supplement this response, if warranted, following the review of those documents.

Finally, Northern Illinois Gas requests that the documents submitted in response to Request Nos. 8 and 9 be treated as confidential information pursuant to 40 C.F.R. §2.203(b).

Without waiving any and all objections to the §104(e) Request for Information, Northern Illinois Gas provides its response as follows:

**Response No. 1.**

- A. Alexander Allison
- B. Dick Tappan
- C. Paula Abatie
- D. Joe Lynch
- E. John Williams
- F. Lee Ahrens
- G. Glen Scheitlen
- H. Frank Holden
- I. John Orso, Sr.
- J. Ray Billett
- K. Tom Thompson
- L. Roy Hepner
- M. George Spore
- N. Frank Lawson
- O. Tom Miller
- P. Tom Bare
- Q. Phil Miller
- R. Russ Hagemann
- S. Dave Grote
- T. Jack Bieswirth

**Response No. 2.**

Northern Illinois Gas has conducted a diligent and thorough search for documents responsive to the §104(e) Request for Information and has not found any documents even remotely related to the Site.

**Response No. 3.**

Northern Illinois Gas has no such knowledge or belief.

**Response No. 4.**

Please see the attached list, Bates Nos. NIG000001 through NIG000002.

**Response No. 5.**

Northern Illinois Gas has never held any ownership interest in the Site nor has it ever operated any business at or on the Site.

**Response No. 6.**

Northern Illinois Gas has conducted interviews of current and past employees and has not identified anyone with knowledge or information about the generation, transportation, treatment or disposal of materials at the Site.

**Response No. 7.**

See Response No. 6.

**Response No. 8.**

Attached please find a list of Comprehensive General Liability policies which may provide coverage for this matter to the extent that Northern Illinois Gas may incur liability for the Site. We believe coverage may be available whether or not any of the listed policies contain a "pollution exclusion" clause. See the attached list at Bates Nos. NIG000380 through NIG000389.

**Response No. 9.**

See the attached copies, Bates Nos. NIG000272 through NIG000379.

**Response No. 10.**

- (a) See the attached copies, Bates Nos. NIG000005 through NIG000084.
- (b) See the attached copies, Bates Nos. NIG000085 through NIG000271.
- (c) See the attached copies of Form 10K, Bates Nos. NIG000085 through NIG000271.
- (d) NICOR Inc. is the parent of Northern Illinois Gas. The only active subsidiary of Northern Illinois Gas is NI-Gas Exploration Company.

**Response No. 11.**

N/A

**Response No. 12.**

N/A

**Response No. 13.**

Northern Illinois Gas to the best of its knowledge has not accepted waste material or hazardous substances for transportation to the Site.

Mr. Carlton D. Cuffman  
July 8, 1994  
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**Response No. 14.**

Northern Illinois Gas recognizes several of the names listed in Request No. 14 but has no information with respect to those entities' or individuals' whereabouts or connection, if any, to the Site.

As required by paragraph F of Attachment B-1, Instructions, of the 104(e) Information Request, a facsimile copy of the affidavit of Mr. Richard Tappan is attached. As soon as I have the original, I will forward it to you under separate cover. If you have any questions regarding the above response, please give me a call.

Very truly yours,

A handwritten signature in black ink that reads "Mark Latham". The signature is written in a cursive, flowing style.

Mark Latham

ML:glb

cc: Alexander C. Allison  
Richard J. Tappan  
Roy M. Harsch

IN RE THE MATTER OF:  
TRI-COUNTY/ELGIN LANDFILLS SUPERFUND SITE

AFFIDAVIT

I, Richard J. Tappan, being duly sworn and upon oath state as follows:

1. This Affidavit is submitted on behalf of the Northern Illinois Gas Company ("Northern Illinois Gas") and pursuant to paragraph 7 of Attachment B-1, Instructions, of the §104(e) Information Request dated May 3, 1994.

2. I am currently employed with Northern Illinois Gas in the capacity of Manager of Codes and Specifications and have been employed by Northern Illinois Gas since 1974.

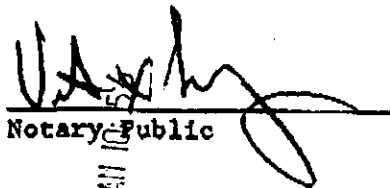
3. I participated in the preparation of Northern Illinois Gas's response to the §104(e) Information Request, and state that I caused a diligent record search of Northern Illinois Gas's files to be made and interviews of employees have been conducted with assistance of counsel. To date, no information, other than that provided in the attached response has, been located.

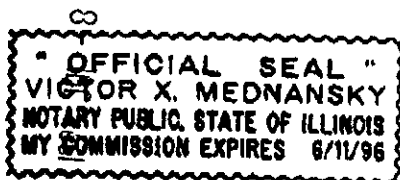
4. To the best of my information and knowledge, the enclosed response is true and correct.

If called to testify as to the foregoing, I am competent to do so.

  
Richard J. Tappan

Subscribed and sworn to  
before me this 8th day  
of July, 1994.

  
Notary Public



## NORTHERN ILLINOIS GAS WASTE GENERATOR SITES

April 15, 1994 at 1:58 p.m.

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SITE	ADDRESS	ZIPCODE	US_EPA_NO	ILL_EPA_NO	CONTACT	TELEPHONE	DESCRIPTION
ANCONA	2 MI S/RT 14 & 4 MI W/RT 23	61311	ILD982610362	1058990001	ED REXIUS	708/983-8888, X3118	STORAGE FIELD
ANCONA, STA 287	ANCONA ROAD	61311	IL0000200147	1058995004	ED REXIUS	708/983-8888, X3118	STATION WITH PIPELINE HEATER
AURORA	424 RIVER ST.	60507	ILD982610412	0894075093	JIM BISHOP	708/844-2042	REPORTING CENTER WITH GARAGE
BELLWOOD	615 EASTERN AVE	60104	ILD113856074	0310155017	GEORGE PARROTT	708/544-5707	DIVISION OFFICE WITH GARAGE
BLOOMINGTON	1201 WEST WASHINGTON ST.	61701	ILD004862934	1130200032	ED VANSOIT	309/828-5002	REPORTING CENTER WITH GARAGE
BLOOMINGTON	1305 MARTIN LUTHER KING DR.	61701	IL0000142596	1130205193	ED VANSOIT	309/828-5992	NEW REPORTING CENTER WITH GARAGE
CRESTWOOD	4829 WEST 135TH ST.	60446	ILD982610420	0310605001	ARNOLD SCHRAMMEL	708/389-1331	REPORTING CENTER WITH GARAGE
CRYSTAL LAKE	300 WEST TERRA COTTA	60014	ILD085222180	1110155023	CHUCK DOCKERY	815/455-0271	DIVISION OFFICE WITH GARAGE
DEKALB	MARKET AND 14TH	60115	ILD982610438	0370100010	AUGIE ROEPKE	815/455-0271	REPORTING CENTER WITHOUT GARAGE
DES PLAINES	GOLF & RIVER ROAD	60018	ILD982425092	0310630034			
DIXON	421 WEST FIRST ST.	61021	ILD085221141	1030200015	DAVE SHIPLEY	815/288-4464	REPORTING CENTER WITH GARAGE
ELGIN	1800 BIG TIMBER RD.	60120	ILD981788110	0894385050	AUGIE ROEPKE	815/455-0271	REPORTING CENTER WITHOUT GARAGE
ELGIN, STA 234	SHOE FACTORY ROAD	60120	ILD984901421	0314384045			
ELK GROVE VILLAGE	750 ELMHURST RD.	60007	ILD984808725	0314405044	BOB RINKENBERGER	708/983-8888, X3142	TRANSMISSION OFFICE
FREEPORT	216 S. LIBERTY STREET	61032-5145	IL0000120170	1770205095			REPORTING CENTER
GLEN ELLYN	90 NORTH FINLEY RD.	60137	ILD114504186	0430455007	BILL MORRISSEY	708/629-2500	DIVISION OFFICE WITH GARAGE
GLENVIEW	100 SHERMER RD.	60025	ILD982420747	0311025003	MIKE NAUMAN	708/724-6704	DIVISION OFFICE WITH GARAGE
GLENWOOD	19199 GLENWOOD	60425	ILD045200367	0311055001	SCOTTY VERCELLI	708/756-0450	DIVISION OFFICE WITH GARAGE
GRIDLEY		61744	ILD984901561	1138160001			
HERSCHER	RT 115, 1/2 MI E HERSCHER RD	60941	IL0000067116	0910455007			
HUDSON	3 MI N/I-55 & 3 MI E/RT 51	61748	ILD982610479	1130700001	JACK GROVES	708/983-8888, X3106	STORAGE FIELD
INGLESIDE	1201 EAST ROUTE 134	60041	ILD984888271	0978995043	AUGIE ROEPKE	815/455-0271	REPORTING CENTER WITHOUT GARAGE
JOLIET	GOUGAR RD. & RT. 30	60431	ILD113857700	1970455027	CLINT WHYBARK	815/740-4100	DIVISION OFFICE WITH GARAGE
KANKAKEE	2704 FESTIVAL DR.	60901	ILD062341805	0910550023	JAY RENDOS	815/937-3400	REPORTING CENTER WITH GARAGE
LAGRANGE	610 EAST AVE.	60525	ILD119479467	0311535010	MARK STALLMANN	708/354-2383	METER SHOP
LAKE BLOOMINGTON	3 MI S/RT 24, 5 MI E/RT 51		ILD984901561	1138160001	JACK GROVES	708/983-8888, X3106	STORAGE FIELD
LEXINGTON	3 MI SW/LEXINGTON ON RT 66	61753	ILD984901579	1130805006	JACK GROVES	708/983-8888, X3106	STORAGE FIELD
LEXINGTON, STA 732	1/2 MI N/LEXINGTON	61753		1130805013			
MORRIS	ROUTE 6	60450	ILD030566228	0630605009	NANCY HUSTON	708/983-8888, X2442	SNG PLANT
MORRIS	PINE BLUFF RD, 3 MI E RT 4	60450	IL0000051383	0630605072			
MR. JIM'S NAPERVILLE	2300 RT. 59	60563	ILD982610172	0430650002	NANCY HUSTON	708/983-8888, X2442	SERVICE STATION - COMPANY PROPERTY
NAPERVILLE	1784 FERRY ROAD	60563	ILD982610123	0430650003	KIM HEAD	708/983-8888, X2953	RESEARCH AND DEVELOPMENT BUILDING
NAPERVILLE	1844 FERRY RD.	60563	ILD982610123	0430650003	CHARLIE WILLIAMS	708/983-8888, X2396	GENERAL OFFICE
OTTAWA	1629 CHAMPLAIN ST.	61350	ILD113823850	0990800024	RICH WOODARD	815/433-3850	REPORTING CENTER WITH GARAGE
OTTAWA	WALLACE & WALTHAM RDS	61350	IL0000051284	0990808076			
PAXTON	300 N. WASHINGTON ST.	60957					REPORTING CENTER WITHOUT GARAGE
PECATONICA	CONGER RD., 1/2 MI N/RT 20	61063		2010255019	BOB HILL	708/983-8888, X84-252	STORAGE FIELD
PONTIAC	2 MI S/RT 116 & 7 MI W/RT 47	61764	ILD982610131	1050600008	ED REXIUS	708/983-8888, X3118	STORAGE FIELD
ROCK FALLS	1407 MCNEAL	61071		1950455038	BOB RINKENBERGER	708/983-8888, X3142	TRANSMISSION OFFICE
ROCKFORD	4651 LINDEN RD.	61109	ILD070173901	2010301119	STEVE RIVARD	815/965-5416	DIVISION OFFICE WITH GARAGE
ROSEMONT	6810 N. MANNHEIM	60018		0312765007			
SCHAUMBURG	1011 WILEY RD.	60172	ILD984783332	0312825013	MIKE NAUMAN	708/724-6704	REPORTING CENTER WITH GARAGE
SHOREWOOD	RT. 59 AND I-55	60436	ILD982610180	1970955013	MAUREEN WILLIAMS	708/983-8888, X3104	TRANSMISSION OFFICE
STOCKTON	151 WEST FRONT ST.	61085		0850455011	PETE ADDOTTA		REPORTING CENTER WITHOUT GARAGE
TOWANDA	1/2 MI W; N SIDE TOWANDA	61776	IL0000061391	1131055002			
TROY GROVE	RT 51 & 2 MI S/RT 52	61372	ILD982610198	0991200002	JOE DETERS	708/983-8888, X3116	STORAGE FIELD

NIG 000001

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April 15, 1994 at 1:58 p.m.

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STOCKTON	151 WEST FRONT ST.	61085		0850455011	PETE ADDOTTA		REPORTING CENTER WITHOUT GARAGE
TOWANDA	1/2 MI W; N SIDE TOWANDA	61776	1L0000061391	1131055002			
TROY GROVE	RT 51 & 2 MI S/RT 52	61372	1LD982610198	0991200002	JOE DETERS	708/983-8888, X3116	STORAGE FIELD

NIG 000002